

1 also chair the NEMA the National Emergency Number
2 Association's Accessibility Committee, and the Association
3 of Public Safety Communication Officials' ADA Committee.
4 These two professional organizations represent over 6,000
5 and 12,000 members, respectively in the field of
6 public-safety communications. We seek to advance the speed,
7 accuracy, and reliability of emergency calling response and
8 are dedicated to the enhancement of public-safety
9 communications.

10 I appreciate the opportunity to speak on the issue
11 of 711 implementation for TRS, as there are several areas
12 that are of paramount importance to the public and their
13 safety. So my comments, while I will be addressing the
14 issue of public education, I also want to address some
15 technical issues that are very much tied to the aspect of
16 public education.

17 We have held in 911 that N11 codes should be
18 preserved for services that are in the public interest and
19 managed by a public service entity. So we definitely
20 support the implementation of 711 for relay services.

21 In the field of emergency communications our goal
22 has long been one nation, one number, and that would be 911
23 for everyone in terms of emergencies. However, we recognize
24 the fact that citizens may choose to use relay service to
25 call when their calls are emergency in nature. Our primary

1 concern is that in this case that all citizens are ensured
2 an equitable level of service, no matter which route they
3 take. In an emergency every second counts. Therefore, how
4 calls are routed and processed becomes critical to the
5 safety and well-being of the caller.

6 Currently, there are a number of ways the various
7 telephone relay providers handle calls that are emergency in
8 nature. This can range from requiring the citizen to give a
9 10-digit number to the communication assistant, to the
10 communicates assistant dialing a zero for operator
11 assistance, or having a directory available for a manual
12 lookup to find the 10-digit number for the public safety
13 answering point.

14 With the implementation of 711 and provider
15 choice, the ability to connect to the correct response
16 agency becomes even more critical. For example, if I live
17 in Texas and I choose to use a company based in another
18 state, how is that company going to process my emergency
19 call and know who it is that they are supposed to be
20 contacting?

21 Technology exists to provide methods of routing
22 calls to the appropriate public-safety agencies without
23 having to require the citizens to take extra steps or any
24 additional steps, such as selective routing to emergency
25 services numbers that are based on the ante that's received.

1 That's currently being done in the 911 environment and
2 certainly could be looked at in the implementation of 711
3 regarding relay calls.

4 These are usually handled by databases through
5 network configurations. In Texas we're looking at
6 implementing a stayed wide database, and through this we are
7 including relay in that whole process so perhaps that they
8 can interface with the statewide database and get those
9 calls handled more efficiently. But what that does require
10 us to do is to work with the companies, the LECs, to resolve
11 interface issues that we face.

12 So, from the operational aspect, should TRS be
13 allowed to pass the callers ante or alle information to the
14 emergency service provider, even where the relay user
15 disconnects before the emergency personnel connect the, all
16 of these are issues that our citizens out there really don't
17 see, don't understand, and we need to educate them with all
18 of these aspects.

19 When I bring this up I'm talking about if someone
20 were to dial a 911 number, and their ante gets to the
21 emergency personnel, and they get disconnected, say, in a
22 domestic disturbance answer situation, the 911 center has
23 the telephone number on which they can make a call back.
24 When they go through a relay and that call is handled that
25 way, they sometimes or often don't get that ante passed over

1 to the 911 center so that they can proceed to handle that
2 call just as if it were made directly to the 911 center.

3 Whatever method is invoked for the implementation
4 of 711, if the citizen calls relay to provide an
5 emergency-related call, it should be consistent,
6 transparent, and as effective as possible for those who
7 would dial 911 direct.

8 So there is a question about minimum standards
9 here that would be required, and having said all of this,
10 there may be some people that feel that we really don't have
11 an issue with the public with regards to the difference
12 between 911 and 711. But I'd like to share a story with
13 you.

14 About a year ago during the opening session of the
15 National Association of the Deaf's Biannual Conference in
16 San Antonio, Texas, Bell Atlantic did announce their first
17 implementation of 711 in Maryland, and the announcement was
18 received with great joy. There was lots of jubilation in the
19 audience. However, at that time I wondered what the impact
20 would be on 911. And also at that time I cochaired the NAD
21 911 Committee.

22 Following the closing of the session the crowds
23 moved towards various workshops and issues forums, and I had
24 many deaf individuals approach me to say how excited they
25 were that the deaf would now have their own emergency

1 telephone number. I continued to get these comments
2 throughout that week-long conference. This confirmed my
3 fear that the number, 711, may be misinterpreted unless
4 there is an educational campaign to clarify what 711 is for
5 and to reinforce that 911 is still the emergency number.

6 I shared these concerns with the people in
7 Maryland, and they took this to heart with their program.
8 But if this is not part of the mandate from the FCC, will
9 other telephone companies and states voluntarily do the
10 same, and will they do it as effectively?

11 So with the implementation of 911, public
12 education becomes more critical to ensure the public
13 understands the purpose and the use of the number. 911 has
14 been doing this type of thing for many years. We have
15 created public service announcements both at local and
16 national levels with various funding sources.

17 Television stations air these public service
18 announcements at no cost, and we include information in bill
19 inserts. We get public figures to proclaim 911, which, by
20 the way, will be on Friday, September 11, is the equivalent
21 of our 911 day. And we celebrate the establishments of
22 those who work in the field of emergency communications.

23 We outreach to the public by appearing at events
24 and through print media. And all of this brings an
25 awareness and the key message of what 911 should be used

1 for.

2 So just as 911 has been doing this, so should the
3 folks involved with the relay. GTE submitted comments in
4 which they outlined their public affairs timeline for their
5 implementation strategy. And I strongly encourage anyone
6 developing such a plan to not only include the public
7 education aspect for the 711, what it's for, but also what
8 it's not for, and that would be to process those emergency
9 calls. They should still go direct to 911.

10 And so while this is an example of an approach to
11 a rolling out of public education it also stopped one month
12 following the implementation of 711. What we've learned in
13 911 is that we can't just do a public education campaign
14 sweep and then just drop it. It requires a concerted,
15 ongoing effort.

16 Public-safety professionals are concerned with in
17 the similarity of the abbreviated dialing pattern that the
18 implementation of an 911 for relay service will cause an
19 increased use for calls that are emergency in nature into
20 the 911 center.

21 So what I would like to say at this point is that
22 please know that I and the organizations in my agency stand
23 ready to assist in whatever way we can in the efforts to
24 ensure the public use the appropriate number at the
25 appropriate time, and I guess that concluded my comments.

1 I do have a diagram of what 911 Service coverage
2 looks like at this time, and you can see that not all states
3 have 100 percent 911 service. And even the areas that do,
4 we continuously have to provide public education to help the
5 public understand when to use it and when not to use it, and
6 now that we've got another abbreviated-dialing number for
7 the public, we need to make sure that they don't get those
8 numbers confused.

9 I've also got just a very, very basic, for you
10 guys that are engineers and technical oriented, this is
11 going to make you laugh inside probably, but this is a very,
12 very basic diagram of if someone were to call 911 with a
13 basic 911 network. Just simply, they go through a central
14 office, and it answers at PSAP. This would be an enhanced
15 networks where it's going to go through a tandem. And
16 that's where they are going to get into their database,
17 their ante/alle dip, and it will arrive at the PSAP, the
18 public safety answering point, at the same time that the
19 call arrives.

20 And then this is a more complicated network where
21 we've got wireless included in that.

22 And so somewhere within here if capability does
23 exist to interface with what databases and systems already
24 exist out there to ensure that the caller, when they are
25 having their call transferred or connected up with the

1 emergency personnel, will also have the same advantage as if
2 they were calling that number direct. That concludes my
3 comments.

4 MS. NANKIN: Thank you. Brenda Battat, would you
5 like to go next?

6 MS. BATTAT: Good afternoon, everybody. I'm
7 really pleased to be here. I'm Brenda Battat, with
8 Self-Help for Hard of Hearing People. I represent a large
9 group of people who are going to be using the relay
10 primarily as voice carryover use it, and up to now tend to
11 get lost in the shuffle, as we have in Maryland. I'll talk
12 about that later. But today voice carryover users do not
13 have do not have access to 711 in Maryland the way that they
14 would like to use it.

15 In terms of educating the public, I think we can
16 learn a lot, as Toni says, to use the methods that they have
17 used for 911. It has to be a very concerted, national type
18 of campaign. But I want to take a little different tack
19 here for the moment, and 711, I believe, is a very important
20 step.

21 HHS supported this in the initial notice of
22 proposed rulemaking, and we still support it now. But I
23 want to have a word of caution here. 711 is a front-end
24 solution to accessing the relay, and I would like to comment
25 that we need to address the perception of relay, and we need

1 address the fact that relay is far from efficient from a
2 voice-carryover perspective and particularly from a hearing
3 person's perspective. And I think this is going to have an
4 impact.

5 If we have a massive campaign to get everybody
6 dialing 711 when they get on there, it's an extremely
7 frustrating experience. I think it's going to backfire on
8 us. I think one of the things that I'm learning now and I'm
9 hearing from my members and constituents out there, they are
10 not getting hung up so much now. They are not hanging up
11 because they don't know what relay is. What's happening now
12 is that they are refusing to take calls because they do know
13 what relay is. And I can give you some examples. I think
14 we've got to move forward.

15 Definitely there are still some people there who
16 don't know what a relay call is, but there are more and more
17 people here in public who do know what relay is, and they
18 just don't have time to deal with it.

19 I can give you some examples. Somebody called
20 Georgetown Hospital to make an appointment with their doctor
21 in an emergency, and they were told, I'm sorry, I'm on my
22 own. I know what a relay call is. I'm manning these desks
23 on my own. I just don't have time. I've taken these relay
24 calls before. They just take too long. Call back on
25 Monday.

1 Our own receptionist in our office came to me one
2 day, and she says, you may get a call and a complaint from
3 one of the people who called, and I said why? She said
4 because there was taking a very long order for publication,
5 and they couldn't fax in the order. I said, would you like
6 to write in the ordinary, but I had to keep putting them on
7 hold. This was a relay call. They were putting in a very
8 long order for publication. She said, I had to put them on
9 hold for at least five times because I had to take other
10 calls that were coming in, and she said, I know they were
11 very mad about that, but there was nothing I could do.

12 I know people have told me that their doctors have
13 actually given them their e-mail address because they just
14 don't want to have to deal with the relay because it just
15 takes too long. The doctor is actually giving out an e-mail
16 address to a patient. Another doctor is faxing back and
17 forth rather than use the relay. They've used the relay.
18 They don't like it. They are faxing back and forth.

19 I had a situation with a colleague of mine, a
20 professional colleague in a professional organization, that
21 I was making relay calls. I use relays -- probably 90
22 percent of my calls are relays, voice carryover, and we have
23 communicated maybe four or five times through relay.

24 We were trying to negotiated a collaborative
25 agreement. And she finally just e-mailed everyone there and

1 said, I want to come over and meet you. And she had told me
2 that even though we had been talking on the relay, she just
3 didn't feel that, you know, we were at the point that we
4 should be, negotiating this whole thing on relay.

5 So I'm just giving you some examples here. I do
6 support 711, but I think parallel with 711 and all of the
7 efforts that everyone is putting into 711 and accessing
8 relay faster, there has to be an equal access, an equal
9 emphasis on improving relay and what it can be for hearing,
10 voice carryover and TTY ASCII users.

11 It has to be matched with an intensive reach and
12 development effort to make sure that the relay is truly
13 efficient and that people who can access by dialing three
14 numbers will want to use it, because right now I'm getting a
15 lot of feedback that they do not want to use it, and it's
16 not because they don't know -- it's because they do know
17 what it is.

18 I think there is an initiative going on right now
19 between an architect and Sprint, which I'm participating in,
20 which is development of speech to text. There are things
21 going on which I think have potential. I think VCO users is
22 a very largely untapped market. It's a very hard market to
23 reach. I don't think we've researched them.

24 Our consumer groups have not done a good job of
25 reaching them, and neither have the carriers. But that is

1 the potential market out there. I would say a very
2 conservative estimate of about five to seven million users,
3 but there are several hurdles that they have to get through.
4 They are comparing using -- with using the voice system
5 because many of them have used that system.

6 They are very impatient with it. They have to
7 take some steps before they use it. They have to purchase
8 equipment that they won't have, that they won't typically
9 have a TTY or software TTY or an VCO phone in their homes.
10 So I just feel like there are a lot of options that would
11 make it attractive for them to use it, for instance, to be
12 able to make a switch in the middle of a call and receive a
13 call.

14 You realize that you are not going to be able to
15 hear this person. You would like to be able to switch from
16 a voice call to a relay call. That should be possible.
17 That is going to make it very attractive to these users.
18 Then it becomes an option, because it's not every call that
19 they can't hear. Sometimes I may make a call that I can
20 hear the person, sometimes I can't.

21 So I just want to emphasize another aspect of
22 this, and don't get me wrong. We support 711, but we have
23 to have something happening that is going to make this a
24 more efficient system to go along with the 711 access that
25 we're proposing.

1 In terms of just -- I think a lot of our guest
2 speakers are going to cover more of the aspect of how to
3 publicize them. I'm not going to spend a long time on that,
4 but I agree very much with Toni, in that you can't have one
5 big splash and then drop it. It has to be a very continued,
6 ongoing effort and a steady effort. I think it has to be on
7 a national level. I think it's something jazzy that maybe a
8 PR company would pick up pro bono. I think 711 is likely to
9 appeal. We may be able to get some pro bono assistance on
10 it. The FCC might be able to.

11 I like very, very much what Sprint has been doing
12 in the State of Maryland with the initiative, partnering
13 with businesses. I think that approach is very good because
14 it's not on the general public that we need to convince, but
15 also businesses. That type of program, where you're working
16 -- I think there needs to be a lot of hands on, a lot of
17 hands on in, a lot of hands on with companies, really
18 teaching them what it is. And I think just a written
19 message or a PSA is not enough to get people to really know
20 how to use it.

21 So that's really what I wanted to cover today.
22 Thank you very much.

23 MS. NANKIN: The next speaker will be Claude
24 Stout.

25 MR. STOUT: Hi. My name is Claude Stout, and I'm

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1 the executive director of the Telecommunications for the
2 Deaf, Inc.

3 I'm with Brenda and Toni, with their remarks.
4 Definitely, a public relations campaign can't be a one-time
5 thing. It can't be a one-shot deal. It has to be something
6 that's ongoing, and it has to be maybe annual, maybe
7 consistent. The PR campaign has to be something that can't
8 ever be stopped. It will require a lot of funding from
9 state-related administrators to bring in the money, but it
10 will be worth it because as you increase understanding and
11 awareness, you are increasing educational opportunities,
12 community interactive opportunities for deaf and hard-of-
13 hearing, lay deaf, and deaf-blind consumers.

14 Toni's comments about 911, I think are very valid.
15 You may be interested in knowing that the statistics have
16 proven that 54 percent of 911 centers all over the U.S. are
17 not -- 911 is not accessible to deaf and hard-of-hearing or
18 lay deaf and deaf-blind individuals -- 54 percent. And
19 we've already talked and preached and beaten that into them
20 for 10 to 20 years.

21 So now here we are with 711, and we have to think
22 this plan out very carefully. We have to network with the
23 communities and talk with authorities and professionals in
24 the deafness communities and find out what makes a public
25 relations campaign work, what makes it stick, what makes it

1 valid.

2 Telephone billing sheets to introduce 711 are
3 nice. That would be fine. Campaigns and advertisements on
4 TV would be fine. Something inserted in a newspaper or
5 magazine would be nice as well, but don't let that be the
6 only three or four things we do. I suggest that we use word
7 of mouth. And by that I mean involve the consumers on our
8 advisory boards.

9 I'd urge that every state have an advisory board,
10 a TRS advisory board, to be more specific, or a TRS group
11 within their -- I know some state governments have a
12 division of deaf and hard-of-hearing or a commission on
13 deafness. Let them have a TRS oversight or advisory
14 responsibility, working with public service commissions.

15 The FCC asked us in what ways can we educate the
16 public. Well, really, we've got to educate public service
17 commissions. There are some public service commissions in
18 the U.S. who are not yet fully knowledgeable or fully aware
19 about deafness and hard-of-hearing and lay deaf and
20 deaf-blind issues and needs regarding telecommunications.

21 If the FCC decides to rule on this, on the public
22 relations campaign, make sure that we pass along
23 instructions to the public service commissions. That way
24 these public service commissions can work more closely with
25 telephone companies in their areas, because telephone

1 companies are going to listen to the public service
2 Commissions on what their examinations are, and they will
3 hear that. The FCC has to pass that along to the public
4 service commissions and in turn it will be passed along to
5 the telephone companies.

6 Now, who is to be involved in each state. We need
7 to make sure that we establish an advisory counsel, and we
8 let the consumers dictate what their needs are. We don't
9 want to later experience a situation where authorities in
10 the state government or in the telephone companies are
11 assuming or making assumptions on the needs of the deaf and
12 the hard-of-hearing community. We have to be careful with
13 how we proceed with the public relations campaign. That's
14 it. Thank you.

15 MS. NANKIN: Thank you. Gil, Becky, would you
16 like to do safety boards?

17 MR. BECKER: I have more than a couple of words to
18 say about this topic, which is very important to us.
19 Methods to educate and provide technical assistance to the
20 public about 711 access to TRS, including having public
21 service announcements.

22 It's called many names, including information and
23 referral, outreach, and also advertsing and public
24 relations. We've always believed that providing information
25 about TRS to the public is critical to the continued

1 success. In fact, we are so strongly committed to that idea
2 that we included a specific dollar amount in our TRS. We
3 knew that we did not have the in-house expertise to
4 disseminate the word about TRS in a cost-effective manner.
5 For this reason we included this requirement in our
6 contract.

7 The, advising, public relations team put in place
8 a comprehensive program to effectively get the word out
9 about 711. Advertising is part of the plan that costs you
10 money. Public relations is endorsement by a third party,
11 such as a newspaper or a TV reporter. Both are important
12 and work together for an effective campaign.

13 Our comprehensive outreach program began on
14 February, 1999 with a press conference that was held in the
15 Maryland Relay Center in Baltimore. This press conference
16 was held jointly with Bell Atlantic, the State of Maryland,
17 Sprint, our current TRS provider.

18 In attendance were members of the Maryland Public
19 Service Commission, Bell Atlantic, state government, the
20 FCC, our governor's advisory board for telecommunications
21 relay, and members of the general public. Key to the
22 success of this kick off was attendance by the media. Our
23 public relations firm was able to entice four television
24 stations, three radio stations, several newspapers, and the
25 Associated Press to attend. From this single event we

1 generated a significant amount of coverage, but we didn't
2 stop there.

3 The same day of the press conference paid
4 television advertising began. We ran five weeks of
5 advertising in two major television markets in Baltimore and
6 the Washington metropolitan area. To save money we ran
7 spots on only one TV station in each market. For those
8 states that have television markets that border two or more
9 states, I strongly suggest that you consider joint
10 advertising.

11 TV advertising is effective, but it's also
12 expensive. We opted not to depend on television advertising
13 bearing free public-service announcements. We have
14 submitted PSAs to public service stations in the past, and
15 have minimal air times. Those that were aired were done so
16 at 3 or 4 o'clock in the morning.

17 The 30-second, 711 television spot was actually
18 the second television spot that we've run within the past
19 year. The first spot was a generic relay spot. The second
20 spot, which announced 711, was directly linked to the first
21 ad. At this time, I would like to show you both of the
22 30-second TV commercials. If you would look at the screens.

23 (A videotape was played.)

24 MR. BECKER: As I said, we ran five weeks of this
25 of this paid advertising back in February, and we also

1 started another four-week campaign just this past week. It
2 just happens to be a coincidence that it's running at the
3 same time as this forum. Several people have come up to me
4 and said they have seen it already.

5 During that second week of February '99 we also
6 began paid present advising in two major newspaper markets
7 in Maryland. The ad -- "It's not the name of a popular
8 convenience store that was convenient," ran in the Baltimore
9 Sun and the Washington Post. In addition, we listened to
10 what Tony had to say, and we wanted to ensure that TTY users
11 did not did not accuse 711 with 911. We always encouraged
12 consumers to call 911 in an emergency. We wanted to make
13 sure there was no confusion.

14 We ran this TTY-oriented ad in six deaf
15 publications both locally and nationally, hoping to get as
16 many relay users as possible, and it ran four times in each
17 of those publications.

18 In addition, Bell Atlantic provided a telephone
19 bill insert which was distributed to almost two and a half
20 million telephone subscribers. The bill insert reads: "Did
21 you know Maryland Relay is now even easier to use?" on the
22 back of it it says: "Now to use Maryland Relay from
23 anywhere inside the state, dial 711." And then it goes on
24 to explain row lay.

25 Bill inserts are an extremely effective tool to

1 disseminate information. Since the initial mailing in
2 February we still get calls requesting information from
3 consumers referring to that bill insert. Bell Atlantic
4 provided that bill insert at no cost to the state, saving us
5 almost \$65,000 in printing and postage.

6 More than a dozen newspaper and magazine articles
7 have been written about 711, a great deal increasing our
8 exposure to the general population as well. We also publish
9 a newsletter twice a year which gets the word out as well.
10 The past two news letters have had articles on 711.

11 Finally, we provide a toll-free, customer-service
12 number which provides information and technical assistance
13 to individuals requesting information. On an average month
14 we receive between 500 and 600 inquiries to our
15 customer-service number. During the month of February we
16 doubled that number, receiving almost 1,200 calls. In
17 total, we have spent we have spent almost \$100,000 on 711
18 outreach. It's well worth it, considering the results have
19 clearly demonstrated the effectiveness of our campaign.

20 And we haven't stopped with this. As Brenda had
21 said, as Toni had said, as Claude said, outreach is a
22 continuing effort. It's not a one-time thing. We're always
23 trying to find to find new ways to get the word out. And,
24 Brenda, we are listening to you. We do know we have issues
25 with VCO issues. We are looking into that.

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1 Honestly, right now, about three to four percent
2 of our total users are voice carryover users. But we do
3 know we have a problem, and we are addressing it. Like I
4 said, we're going to have a dedicated toll-free number, 800
5 number. It's not going to be as easy as 711, but we will
6 get much quicker response time, and we are listening. Thank
7 you.

8 MS. NANKIN: Thank you. Karen Strauss, would you
9 like to talk on this topic?

10 MS. STRAUSS: Very, very briefly. In the interest
11 of saving time, I just wanted to note that I could be
12 speaking out of turn, but I remember that in a prior FCC
13 proceeding NECA's Interstate Advisory Committee suggested
14 that the entity that can coordinate a national campaign for
15 advertising relay service.

16 So I remember that, and I'm asking the FCC to take
17 that offer seriously. We have an entity that has actually
18 volunteered to coordinate a national campaign, and there is
19 very little reason that recovery can of the costs of
20 engaging in such a campaign cannot be recovered through the
21 interstate relay fund, just as I would presume many of the
22 costs of intrastate campaigns are covered through intrastate
23 funds.

24 Other than that, the only other thing I wanted to
25 mention, now I have the floor is that I am concerned,

1 because I know we're running out of time, I am concerned
2 about asking TTY callers to go back to using an 800 number
3 for fast access since the original purpose of the petition
4 filed way back, I believe in 1993, was to expedite access by
5 TTY users through 711.

6 So that is a grave concern to me. If voice users
7 are going to be obtaining fast access but TTY users have to
8 go back to using an 800 number to obtain quick access, and
9 I'm hoping that there is a solution that can be achieved
10 that fully accomplishes the goal of the original 711
11 petition for TTY access.

12 MS. NANKIN: Thank you, Karen. The third topic
13 will be the length of time in which states can implement
14 switch-based or AIN 711 system to access TRS. We will have
15 two speakers on this topic, Toni Dunne and Claude Stout.
16 Tony, would you like to start?

17 MS. DUNNE: Here is where I get to say that I
18 misunderstood exactly what my topic was here, and I am
19 really not the person to talk about switch-based
20 implementation timelines. I understood it to be more
21 implementation of the public-education aspect of the issues
22 that we were talking about just previously, so I'll defer.

23 MS. NANKIN: Okay. Claude Stout, would you like
24 to say a few words on this topic?

25 MR. STOUT: I'm not qualified to comment on the

1 technical feasibility of a nationwide 711, but I think that
2 I need to again spell out the consumers' examinations, and
3 those are that please implement 711 nationwide as soon as
4 possible. Don't use a lack of technology as an excuse for
5 not implementing it earlier. Find money or find resources
6 somehow, and meet our needs as soon as possible. Thank you.

7 MS. NANKIN: Thank you. Since we haven't really
8 addressed this issue, does anyone have any words say about
9 this issue before moving on to the fourth topic? Paul?

10 MR. LUDWICK: This is Paul Ludwick with Sprint. I
11 obviously can't speak for the local exchange companies, but
12 from a relayprovider perspective 711 implementation is not
13 that difficult. So I would expect that a 12-to-18-month
14 time frame for the replay provider is doable. And I guess I
15 have to qualify that a little bit because it really depends
16 on what type of involvement the states expect.

17 From the relayprovider view, we have very little
18 power in implementing 711. We're literally mostly along for
19 the ride. As long as the state government and the state
20 commissions can coordinate local exchange companies, bring
21 them into agreement, and agree on an implementation plan, I
22 think all of the relay providers would agree, and I don't
23 mean to speak for them, but I believe that it would not be
24 difficult for us to support that implementation.

25 MS. NANKIN: Thank you. Does anyone else wish to

1 speak on this topic? Sunny, would you like to say a couple
2 of words?

3 SUNNY: As a former engineer I'm sure that all of
4 you engineers will agree to this. Our motto is "nothing is
5 impossible." So I think that with the FCC's mandate, I
6 strongly believe that 711 will be available to everyone
7 including California within a year or so.

8 MS. NANKIN: Thank you. Let's move on to the
9 fourth topic, which will be whether to transfer the
10 administration of N11 codes at local level from the
11 incumbent LECs to the administrator. Rich Ellis will talk
12 on this topic.

13 MR. ELLIS: As a local exchange carrier, we've
14 gotten out of the business of local exchange administration
15 over the past year. We see no reason to maintain oversight
16 over 11 administration. So we would highly recommend that
17 it be deeded over to an independent entity. Is that short
18 and sweet enough for you?

19 MS. NANKIN: That was perfect. Thank you. Now,
20 as looking at the clock, it is quarter-to-four, I think we
21 are going to be going over a little bit.

22 The next section will be questions, and we're
23 going to start with carrier-of-choice questions from the
24 first session. So does anyone have any comments or
25 questions on the carrier-of-choice issue? Yog, would you

1 like to start?

2 MR. VARMA: I have a question for Mr. McClelland
3 of MCI. You indicated earlier today that the multivendor
4 environment has not been addressed, and the
5 carrier-of-choice option is a slow option. I was wondering
6 if you could just amplify on that as to why there are
7 difficulties in achieving carrier of choice for the TRS
8 users, either under the Advanced Intelligent Network
9 architecture or the base translation.

10 MR. McCLELLAND: Bill McClelland with MCI
11 WorldCom. Now, are you talking about carrier of choice as
12 far as the toll provider or relay provider of choice?

13 MR. VARMA: Well, actually both.

14 MR. McCLELLAND: Okay. I will address both, then.
15 Carrier of choice, as far as carrying the toll part of the
16 call, be it interstate or intrastate, any part of the toll
17 call is not something that we don't do. We do that every
18 day. We can do it on a percall basis. We can do it on a
19 presubscribed basis. And if that carrier is available to
20 you in that state, we will provide that carrier for you
21 through our relay system, and that's something that we
22 provide today.

23 MR. VARMA: Do you have that information residing
24 in your database --

25 MR. McCLELLAND: Yes, we do.

1 MR. VARMA: -- as to who the long-distance carrier
2 is that the TRS user as chosen?

3 MR. McCLELLAND: If they are presubscribed, we
4 have that in a database, and that is what they are
5 automatically picked to. If they are not presubscribed and
6 they request a carrier, then we select that carrier and
7 provide them access through that carrier.

8 MR. VARMA: Okay. Is it fair for me to say, then,
9 that you have connectivity from the TRS center to various
10 long-distance providers in that area, so that you are able
11 to send the calls through the points of presence of those
12 interexchange carriers?

13 MR. McCLELLAND: Yes, sir, we do. Are you ready
14 for the other part now?

15 MR. VARMA: Yes.

16 MR. McCLELLAND: Okay. The other part is the more
17 difficult part, in that 711, if we look at the
18 implementation of 711 right now, like in Maryland, they
19 translate, or they use AIN to point all 711 calls to a
20 specific designation. All right. To one provider. Okay.

21 In California you either have to select a provider
22 or you would have to figure out how to do a percentage of
23 traffic or you would have to put an upfront mechanism that
24 would allow an individual to select which provider they want
25 to go to. Because of pay phones and PBXs and that type of

1 stuff, you would have to upfront that information, which
2 involves connecting and communicating with what the user
3 want wants to provide if you're doing solely 711. All
4 right?

5 If you presubscribe everyone in the state, if they
6 dial 711, I want to use this provider over this provider,
7 you have to multiple pick that AIN number. Let's say that I
8 chose MCI as my relay provider of choice and some intrastate
9 provider for my in-state toll calls and a different provider
10 for my interstate toll calls and even a third provider for
11 international calls. That multiple pick in there involves
12 more databases and more development in the local exchange.
13 So there is a huge cost in that part.

14 The upfront gateway, which would address PBX
15 systems and common-use telephones, puts one more step before
16 you ever get into the relay. You have to work yourself
17 through another VRU unit before you would ever get into
18 relay to decide what you want to do from there, so that's
19 where the additional delation would be.

20 MR. VARMA: Thank you.

21 MS. NANKIN: Gail, do you have any questions on
22 carrier of choice? Brenda?

23 MS. BATTAT: I'd like to get something clarified,
24 whoever would like to answer it. You know, there are
25 literally hundreds of long-distance providers, and if you

1 contact the TRS in the state and ask them for a list of
2 long-distance companies that you can choose from, they will
3 send you a very small list.

4 And I have asked why is the list so small, and
5 they say, well, the long-distance companies are not
6 registered with us and arranging for billing arranging with
7 us, and if we don't have that billing arranging, if they
8 don't register with us, then we can't offer them. And this
9 is happening. People are wanting to designate a carrier,
10 but they can't because the carrier has not registered.

11 Is this a fact, and will this still be a fact with
12 711, because it definitely is an issue? When we in our
13 office wanted to register with one of them we couldn't. We
14 wanted to select a carrier, and we couldn't because they
15 weren't registered with the state relay. And apparently the
16 state relay have told us that they have written to all of
17 the carriers and said, you know, register with us, but they
18 don't bother to do it. I don't understand what's going on.
19 I need to really understand what's happening.

20 MS. NANKIN: Burt, do you want to answer that
21 question?

22 MR. BOSSI: This is Burt Bossi with AT&T. I
23 commented on the ex parte comments regarding this issue, and
24 I'll just read them off to you. I think it answers your
25 question pretty accurately. Let me warn you, it dives a

1 little bit into the technology involved.

2 But, first of all, I'll say this has little to do
3 with 711. It is more so just carrier of choice, and there
4 was an FCC meeting regarding this issue that I know Paul was
5 at and a few others. We talked about this, and I'll just
6 summarize the discussion from that meeting.

7 The TRS providers are not singularly liable for
8 the availability of these different carriers. First, the
9 carrier needs to make public that they are interested in
10 carrying TRS traffic. Then the carrier is invited to
11 provision a specialized Feature Group B-type trunk into the
12 same access tandem that that state's relay is providing.

13 The primary cost to the carrier is this Feature
14 Group B-type trunk, and when a business case is prepared
15 weighing the expenses of the special facilitate with the
16 relatively small amount of traffic, the carriers usually
17 decline the invitation. This is why only the larger
18 carriers make themselves available through TRS nationwide.

19 So, for AT&T's sake, if you asked us for the list,
20 it's under 10, but there have been many invitations to join
21 us.

22 Then we talked about dial-around carriers, or what
23 we call the 10-10 companies. They have an even more
24 difficult business case to build because often these
25 carriers seize regionally specific opportunities and are

1 only available in high-profile demographic market areas.
2 This is not always where the state's relay center or
3 network-access tandem is located, so, again, the expense is
4 difficult to justify. That's the end of my comments.

5 MS. NANKIN: Thank you. I think Dave had his hand
6 up first. Dave Ward, do you want to speak on this issue?

7 MR. WARD: Yeah. I'm Dave Ward of the FCC's
8 Network Systems Division. I concur with everything Burt had
9 said. And the Commission we look at the technical issue
10 that Burt brought up, and we also look at the enforcement
11 issue. We have regulations on the books now that require
12 carriers to comply with certain TRS access, and we're
13 looking at that right now.

14 MS. NANKIN: Karen, did you want to add something?

15 MS. STRAUSS: I think you may have just answered
16 my question, but now I understand much better why somebody
17 came into my office last week and was told that when he
18 tried to us the 10-10 number he was told by the relay
19 communications assistant he couldn't not. And, in fact, if
20 he wanted to, they were suggesting that he would be an
21 additional surcharge would be imposed on him.

22 That part doesn't make a lot of sense to me, but I
23 understand now why he was rejected, and my question to the
24 FCC was, what are you going to do about this, because this
25 is inconsistent with what the law is? And what I think I

1 hear you saying is that your looking into this and will
2 notify these carriers that they don't have the option of
3 rejecting these relay calms. It's completely inconsistent
4 with the ABI.

5 MR. WARD: That's not entirely true, and just let
6 me amplify that. If a relay customer has access to a
7 certain number of carriers in their local area, say, for
8 example, AT&T, MCI, and Sprint are offering long-distance
9 service to people of a certain town and a relay customer is
10 from that town, then they, under FCC representations, should
11 have party or access to the same choice of carriers that
12 they have through their locally switch that hearing
13 customers have through their locally switch in the same
14 area.

15 What we're seeing here is the possibility of TRS
16 users accessing the list of long-distance carriers that are
17 available at the same access tandem as the one that serves
18 the local exchange TRS center. So, for example, the people
19 of Cecil County, Maryland may have one list of interexchange
20 carriers to pick from, and that doesn't matter if they are
21 TRS users or hearing users, but the people of Baltimore
22 County have another list.

23 So through the current access-tandem arrangements
24 people who call TRS into Baltimore County get the choice of
25 the Baltimore County residents and not the Cecil County